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June 27, 2025

## VIA ECF

Magistrate Judge Victoria Reznik  
United States District Court  
Southern District of New York  
300 Quarropas Street, Courtroom 420  
White Plains, NY 10601-4150

Re: **The Wave Studio, LLC v. General Hotel Management, Ltd., et al.**  
**Civil Action No: 7:13-cv-09239-CS**

Dear Judge Reznik:

We write pursuant to the Court's Order of June 20, 2025 (Doc. No. 529) and in response to Plaintiff's correspondence of June 18, 2025 (Doc. No. 528). This firm represents only General Hotel Management ("GHM"). As a general proposition, GHM joins and reiterates the arguments set forth in the submissions by VFM Leonardo and related Defendants (Doc. No. 546) particularly as they relate to the purpose of the Master Amended Complaint, and prior settlement discussions.

Initially, as to Plaintiff's request that GHM be terminated from the docket in this case, the undersigned requires additional time to confer with its client regarding this request in order to provide a substantive response. As Plaintiff's counsel did not attempt to contact the undersigned regarding this request in advance and we only first heard of it when Plaintiff filed its letter, and given the time differences and travel schedules of decisionmakers at GHM, GHM respectfully requests that the Court grant it a short extension to respond to this specific issue, until **Monday, July 7, 2025**.

As to the remainder of the issues raised in Plaintiff's letter, GHM respectfully notes the following, solely in the interest of clarification and context. We note that Plaintiff's letter was written by its current counsel (who is at least the seventh firm to represent Plaintiff in the history of the case, and the third to represent Plaintiff in this case since just 2023). Neither this counsel nor their predecessor was present at the hearings and settlement conferences and numerous discussions regarding the Master Amended Complaint (or any matters until recently). The statements in Plaintiff's letter are not only objectively false for those of us that were present for those conversations and hearings but also contradicted on their face by the relevant transcripts and related orders, as explained in more detail in the letter filed by the co-Defendants named above.

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Accordingly, GHM respectfully requests an extension of time until July 7, 2025 to respond to Plaintiff's request to terminate GHM from the docket. GHM defers to the letters filed by the other co-Defendants as to the remainder of the issues, which do not impact GHM directly.

We thank the Court for its attention to this matter.

Respectfully submitted,

*s/Abigail J. Remore*

Abigail J. Remore

AJR:sd

Defendant GHM's request for an extension is **GRANTED**, and their deadline to respond to Plaintiff's request to terminate it from the docket is extended to **7/7/2025**.

SO ORDERED.



Hon. Victoria Reznik, U.S.M.J.

Dated: 7/2/2025